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December 21, 2021

Honorable Brian M. Cogan United States District Judge for the Eastern District of New York 225 Cadman Plaza East Brooklyn, New York, 11201

Re: <u>United States v. Colinford Mattis</u>, 20 Cr. 203 (BMC)

Your Honor:

With the support and consent of Pre-Trial Services Officer Amanda Sanchez, I write to request that Mr. Mattis's condition of home detention be modified to a curfew as directed by Pre-trial Services. While the government opposes the request, Pre-trial services, through PTSO Amanda Sanchez has informed us that home detention does not appear to be necessary any longer for Mr. Mattis. Instead, according to pretrial, Mr. Mattis should be supervised by curfew as directed by pre-trial. USPTO Sanchez supervises Mr. Mattis' performance on pre-trial and has been his pretrial officer since April 2021. She is in regular contact with him and supervises him and his movements.

Granting this request will serve two goals: one, it will allow Mr. Mattis to progress at his job with Bossing Up, Inc. Mr. Mattis has secured employment that, in part, provides the opportunity for him as a sales associate to earn commission-based income. As a practical matter, these sales generally require inperson, door-to-door visits; they cannot be done effectively from Mr. Mattis's home. Pre-trial has informed us that allowing him that opportunity would be feasible if he was on curfew. Second, it will allow pretrial services to better allocate their resources. Pre-trial Services Officer Amanda Sanchez supports this application and is available to the Court.

I thank the Court for its time and consideration of this request.

		Respectfully submitted,
		/s/Sabrina P. Shroff Attorney for Colinford Mattis
SO ORDERED	: Hon. Brian M. Cogan Judge, United States Distr	rict Court